

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 19 cr 333 ECT

UNITED STATES OF AMERICA,)
) INFORMATION
Plaintiff,)
) 18 U.S.C. § 1343
v.) 18 U.S.C. § 981
) 21 U.S.C. § 853
ROBERT MICHAEL GILLESPIE,) 28 U.S.C. § 2461(c)
)
Defendant.)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Wire Fraud)

1. From in or about 2006 and continuing through in or about 2018, in the State and District of Minnesota and elsewhere, the Defendant,

ROBERT MICHAEL GILLESPIE,

devised and intended to devise a scheme and artifice to defraud and to obtain money and property from Company A, a business headquartered in the State and District of Minnesota, by means of materially false and fraudulent pretenses, representations, and promises, and knowingly transmitted and caused to be transmitted writings, signs, signals, and pictures by means of wire communication in interstate commerce for the purpose of executing such scheme and artifice.

2. On or about July 19, 2018, in furtherance of his scheme and artifice to defraud and obtain money and property from Company A, the Defendant knowingly transmitted and caused to be transmitted writings, signs, signals, and pictures by means of

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wire communication in interstate commerce by knowingly conducting an unauthorized search of Company A's computer database for information regarding stored value cards using a computer in Company A's Grand Rapids, Michigan office to access the computer database stored at Company A's Eden Prairie, Minnesota headquarters. On or about July 24, 2018, the Defendant went to a store located in Ionia, Michigan, and, without authorization, redeemed a stored value card he identified through the aforementioned unauthorized computer search. The Defendant completed the redemption of the stored value card for cash using access code information he obtained through said computer search. The Defendant provided the point-of-sale clerk at the store with the false name "Jack" as part of this redemption transaction in an attempt to conceal his unlawful redemption of the stored value card.

3. All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

4. Count 1 of this Information is hereby re-alleged and incorporated as if fully set forth herein by reference for the purpose of alleging forfeitures.

5. If the Defendant is convicted of Count 1 of the Information, the Defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) in conjunction with Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation of Count 1 of this Information.

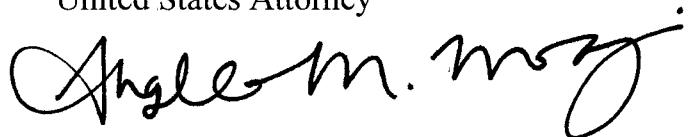
6. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided

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for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: December 18, 2019

BY: ERICA H. MacDONALD
United States Attorney



BY: ANGELA M. MUÑOZ-KAPHING
Assistant U.S. Attorney
Attorney ID No. 0389207